

Hearing Date: March 27, 2018, 10:00 a.m.
Objection Deadline: March 20, 2018, 5:00 p.m.

Randolph E. White, Esq.
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*Attorneys for Fondo de Proteccion Social
de los Depositos Bancarios*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

LEHMAN BROTHERS HOLDINGS INC., et al.

**Chapter 11
Case No. 08-13555 (SCC)**

Debtors.

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NOTICE OF MOTION FOR ORDER DIRECTING THE RELEASE OF DOCUMENTS

PLEASE TAKE NOTICE, that upon the motion (the “Motion”) of Fondo de Proteccion Social de los Depositos Bancarios, f/k/a Fondo de Proteccion Social de los Depositos Bancarios y Proteccion Bancaria (“FOGADE”) dated February 15, 2018 by their attorneys, White & Wolnerman, PLLC (“W&W”), the supporting declaration of Gustavo Soto M. dated February 14, 2018 and the accompanying Exhibits, the undersigned will move this Court before the Honorable Shelly Shelley C. Chapman, United States Bankruptcy Judge, at her courtroom #623, located at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on March 27, 2018 at 10:00 a.m. or as soon thereafter as counsel may be heard for the entry of an order directing that the Debtors, their agents, servants and employees, including the Plan Administrator, Debtors’ counsel and Epiq Systems, Inc. release all

settlement agreements and any related documents pertaining to the allowed claims 62722 and 62726 to FOGADE and FOGADE's counsel.

PLEASE TAKE FURTHER NOTICE, that objections ("Objections"), if any, to the relief requested by FOGADE in the Motion shall (i) be in writing, (ii) conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York, (iii) set forth the name of the objecting party, the nature of the objection and the specific grounds therefor, and (iv) be filed with the Bankruptcy Court on the Court's ECF filing system, with a copy to the chambers of the Honorable Shelley C. Chapman, and served in a manner so as to be received by White & Wolnerman, PLLC, Attn: Randolph E. White, Esq., 950 Third Avenue, 11th Floor, New York, NY 10022, on or before March 20, 2018 at 5:00 p.m.

PLEASE TAKE FURTHER NOTICE, that replies to any timely file Objections may be filed on or before March 25, 2018.

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned from time to time without further notice other than announcement of the adjournment date in court on the date scheduled for the Hearing.

Dated: New York, New York
February 15, 2018

WHITE & WOLNERMAN, PLLC

By: /s/ Randolph E. White
Attorneys for FOGADE
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New York, NY 10022
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